

APPENDIX A

Teva Indictment Pravastatin Allegations	Teva AG Complaint Pravastatin Allegations
<p>“... on or about May 2, 2013, CW-1 [REDACTED] and CW-2 [REDACTED] communicated by phone and discussed that defendant TEVA would follow a price increase by defendant GLENMARK on several generic drugs that defendant TEVA and defendant GLENMARK both sold, including pravastatin.” Teva Indictment ¶ 22.</p> <p>“On or about May 15, 2013, defendant GLENMARK distributed price increase notifications to its customers, announcing increases to the prices of certain generic drugs, including pravastatin, effective May 16, 2013.” <i>Id.</i> at ¶ 23.</p> <p>“In or around May 2013, CW-1 [REDACTED] and Individual 2 [REDACTED] communicated by phone and discussed that defendant TEVA and Apotex would increase prices on pravastatin.” <i>Id.</i> at ¶ 24.</p>	<p>As early as May 2, 2013, Defendant Patel engaged in discussions regarding a price increase for Pravastatin with CW-5 [REDACTED], a senior executive at Glenmark. Early in the morning of May 2 . . . she received a call from CW-5 [REDACTED] and they discussed price increases for a number of different drugs, including Pravastatin.” Teva AG Compl. ¶ 682.</p> <p>“On May 15, 2013 . . . Glenmark notified its customers that it would substantially raise the price of Pravastatin, effective May 16, 2013.” <i>Id.</i> at ¶¶ 688-89.</p> <p>“From May 20-24, Defendant Patel had the following series of phone calls with B.H., a senior sales executive at Apotex, during which Apotex agreed to raise its price for Pravastatin . . .” <i>Id.</i> at ¶¶ 695; <i>see also</i> ¶¶ 920-21.</p>
Teva Indictment Etodolac ER Allegations	Teva AG Complaint Etodolac ER Allegations
<p>“... in or around July and August 2013, CW-1 [REDACTED], acting on behalf of defendant TEVA, and Aprahamian, acting on behalf of Taro U.S.A., discussed and agreed to increase prices for etodolac ER.” Teva Indictment ¶ 40.</p> <p>“Approximately six days before either defendant TEVA or Taro U.S.A. announced a price increase for etodolac ER to their customers or commercial publications, CW-1 [REDACTED] and Aprahamian each circulated spreadsheets within their respective companies containing the specific agreed-upon proposed WAC and other prices for etodolac ER.” <i>Id.</i></p>	<p>“Defendants Teva and Taro – through Defendants Patel and Aprahamian – colluded to significantly raise the price of Etodolac ER in August 2013.” Teva AG Compl. ¶ 474.</p> <p>“On July 22, 2013 – before any price increases took effect or were made public – Defendant Patel added both Etodolac and Etodolac ER to her price increase spreadsheet for the first time . . .” <i>Id.</i> at ¶ 711.</p>

Teva Indictment Tobramycin Allegations	Teva AG Complaint Tobramycin Allegations
<p>“... beginning in or around July 2014, CW-1 [REDACTED] discussed Sandoz’s launch of tobramycin . . . with CW-3 [REDACTED]. At the time of Sandoz’s launch, defendant TEVA was the exclusive supplier of tobramycin. CW-1 [REDACTED] and CW-3 [REDACTED] discussed which customers defendant TEVA wanted to retain, and which customers Sandoz should pursue.” Teva Indictment ¶ 51.</p> <p>“CW-1 [REDACTED] . . . agreed to relinquish a large national retail chain customer to Sandoz. After the customer asked defendant TEVA for its best and final offer to retain the business, defendant TEVA declined to bid or compete to retain the customer.” <i>Id.</i></p>	<p>“Nearing Teva’s loss of exclusivity and Sandoz’s entry, on July 1, 2014, Teva and Sandoz began sharing information and coordinating to divide up the market for Tobramycin. Defendant Patel exchanged seven (7) calls with CW-1 [REDACTED] on July 1, during which they discussed Sandoz’s launch plans and how to divide up the market for Tobramycin.” Teva AG Compl. ¶ 241.</p> <p>“Patel told CW-1 [REDACTED] specifically that Teva would not even submit a bid to CVS. . . . According to plan, Teva conceded the CVS business to Sandoz after CVS contacted Teva and requested that Teva submit a lower price to retain the business.” <i>Id.</i> at ¶¶ 243–44.</p>